

BECKHAM, LISA

From: WARD, LA WEEDA
Sent: Friday, October 24, 2014 9:28 AM
To: WARD, LA WEEDA
Subject: Fw: Exide and Quemetco Information
Attachments: 2010 List of Facilities with SICs.xls

From: Victoria Moaveni <vmoaveni@aqmd.gov>
Sent: Friday, June 28, 2013 4:38 PM
To: WARD, LA WEEDA
Subject: RE: Exide and Quemetco Information

Good afternoon La Weeda:

Sorry for my delayed response. I was out sick for the entire week and this is my first day back. Please see the attached file for the facility SIC codes in Table 3-2. You can also find the control factors and growth factors used in the 2007 AQMP in the link that I provided you in my previous e-mail: http://www.aqmd.gov/aqmp/07aqmp/aqmp/Appendix_III.pdf. Please refer to Tables 2-1 and 2-5 of Appendix III for control factors and SIC growth factors, respectively. In addition, Chapter 2 of Appendix III provides detailed description of how each factor was used in projecting emissions for each major source category.

Have a great weekend.

Victoria

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From: WARD, LA WEEDA [<mailto:WARD.LAWEEEDA@EPA.GOV>]
Sent: Monday, June 24, 2013 11:21 AM
To: Victoria Moaveni
Subject: RE: Exide and Quemetco Information

Thank you Victoria. This helps. Can you also provide the Table 3-2 facilities SIC codes so that I can determine if the "Metal Processes" actual emissions from Table 3-2 are within the range of error as the projected inventory presented in

Table 3-1. Also, could you please provide the growth and control factor used to project the 2010 and 2015 emissions?
Thank you again for your help.

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From: Victoria Moaveni [<mailto:vmoaveni@aqmd.gov>]
Sent: Friday, June 21, 2013 3:00 PM
To: WARD, LA WEEDA
Cc: Philip Fine; Tom Chico; Ali Ghasemi
Subject: Exide and Quemetco Information

La Weeda:

Per our conversation, I am providing you with the following:

- 1. More detailed description of Table 3-1, and reconciliation of Tables 3-2 with Table 3-1;*
- 2. Detailed emission inventory for Exide and Quemetco and the allocation of fugitive emissions (reconciliation of facility emissions in the FIND program vs. Table 3-2 in the SIP); and*
- 3. Contact information of the modeling staff member.*

Detailed Description of Table 3-1:

The nonattainment status in the Los Angeles County is based on lead emissions from two large lead battery recycling facilities, Exide Technologies and Quemetco Inc. Since the nonattainment was a localized problem and not a regional one, the focus of the 2012 Lead SIP was mainly on emissions from these two facilities.

The emissions inventory in Table 3-1 is divided into four major classifications: point, area, off-road, and on-road sources. The 2010 and 2015 point source emissions given in Table 3-1 are facility-reported 2002 emissions, which are projected to 2010 and 2015 using the growth and control factors developed for the 2007 AQMP. (2002 is the base year for the 2007 AQMP.) The other categories are estimated as follows:

- The 2010 and 2015 on-road emissions are calculated using the CARB EMFAC2007 V2.3 emission factor and the transportation activity data provided by the Southern California Association of Governments (SCAG) from their modified 2004 Regional Transportation Plan (2004 RTP) as used in the 2007 AQMP.*
- The 2010 and 2015 area source and off-road emissions are also calculated based on 2007 AQMP inventories and projections. These emissions were developed primarily based on estimated activity levels and emission factors. The future projections rely upon the 2004 RTP, and the planning assumptions and the best available information from CARB's EMFAC for the on-road mobile source emissions inventory, CARB's off-road model for the off-road mobile source emission inventory, the latest point source inventories, emission limits in adopted rules, air quality modeling analysis, and SCAG's growth forecast assumptions utilized in the 2007 AQMP.*

The point source emissions given in Table 3-2 are facility-reported activity in 2010 as you have confirmed from our "Find" utility; whereas the point source emissions given in Table 3-1 are grown and controlled from a 2002 baseline. Thus, the point source emissions in Tables 3-1 and 3-2 cannot be reconciled. For more details on how Table 3-1 emissions were estimated, please visit: http://www.aqmd.gov/aqmp/07aqmp/aqmp/Appendix_III.pdf

Detailed Emission Inventory for Exide and Quemetco:

Per your request, I am providing you with detailed, per process emission information for both Exide and Quemetco. Fugitive emissions are believed to be a major source of lead at these two facilities. Given the fact that fugitive emissions are challenging to estimate and cannot be readily captured or directly measured, the methodology in the EPA document titled: "Development of the RTR Emissions Dataset for the Secondary Lead Smelting Source Category", used for development of Secondary Lead Smelting NESHAP was used by AQMD staff to estimate fugitive emissions from these two facilities. Using the EPA formula, estimated fugitive lead emissions for Exide (Vernon) and Quemetco are 130 lbs/yr and 85 lbs/yr, respectively. (Please refer to pages 3-2 to 3-4 and 3-9 to 3-10 of the Final 2012 Lead SIP Los Angeles County).

For Exide, the adjusted fugitive lead emissions of 130 lbs/year was used compared to 82.52 lbs/yr as reported in the AQMD's AER program. As can be seen in the following table, Exide reported fugitive lead emissions from two sources: 69.03 lbs/year from roadway fugitives and 13.49 lbs/year from the raw materials processing system (RMPS). Although these amounts were not used in the modeling, this relative ratio (83.65% from roadway fugitives and 16.35% from the raw materials processing) was used to apportion the total fugitive lead emissions listed in the EPA document. (Please refer to page 5-4 of the Final 2012 Lead SIP Los Angeles County).

Exide 2010 Lead Emissions:

Form No.	Description	AER Reported Lead Emissions (lbs/yr)	Adjusted Lead Emissions (lbs/yr)
B4-1	Soft Lead Baghouse	58.25	58.25
B4-2	Hard Lead Baghouse	58.08	58.08
B4-3	Dryer Baghouse	41.17	41.17
B4-4	Torit Baghouse	195.35	195.35
B4-5	Torit Baghouse	36.79	36.79
B4-6	Scrubber Stack	15.77	15.77
B4-7	Material Handling	82.17	82.17
B4-8	MAC Baghouse	21.90	21.90
B4-9	MAPCO Demister	15.42	15.42
B4-10	Roadway Fugitive	69.03	109.28
B4-11	RMPS Fugitive	13.49	21.36
Total Emissions		607.42	655.54

For Quemetco, the fugitive lead emissions of 85 lbs/year calculated based on EPA's document was used. In the AQMD's AER program, Quemetco did not report fugitive lead emissions for 2010. Since the battery wrecking area is approximately equivalent to Exide's raw materials processing area, the same ratio (83.65% from roadway fugitives and 16.35% from the raw materials processing) was used to apportion the total fugitive lead emissions listed in the EPA document. (Please refer to page 5-4 of the Final 2012 Lead SIP Los Angeles County).

Quemetco 2010 Lead Emissions:

Form No.	Description	AER Reported Lead Emissions (lbs/yr)	Adjusted Lead Emissions (lbs/yr)
B4-1	Secondary Lead Smelting Process	1.06	1.06
B4-2	Baghouse Busch Unit A	0.76	0.76
B4-3	Baghouse Busch Unit B	0.91	0.91
B4-4	Baghouse Busch Unit C	1.52	1.52
B4-5	Baghouse Busch Unit D	0.76	0.76
B4-6	Baghouse Busch Unit E	0.57	0.57
B4-7	Baghouse Busch Unit F	1.24	1.24
B4-8	Baghouse Busch Unit G	3.21	3.21
B4-9	Baghouse Busch Unit H	0.48	0.48
B4-10	Baghouse Busch Unit I	0.69	0.69
	Fugitive		85.00
Total Emissions		11.21	96.21

Contact Information of the modeling staff member:

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Thanks, Victoria

Victoria Moaveni

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